

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DANA W. WILEY,	)	
	)	Civil Action No. 18-1207-CRE
Plaintiff,	)	Chief Magistrate Judge Cynthia R. Eddy
	)	
v.	)	
	)	
WORLD WRESTLING	)	
ENTERTAINMENT, INC., VINCE	)	Electronically Filed
MCMAHON and JOHN DUE	)	
	)	
Defendants.	)	

**REPLY BRIEF IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS UNDER FRCP 12(b)(6)**

**K&L GATES LLP**

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*Counsel for Defendants World Wrestling  
Entertainment, Inc. and Vince McMahon*

Defendants World Wrestling Entertainment, Inc. and Vince McMahon (collectively, “Defendants”) respectfully submit this reply brief in support of their motion to dismiss Plaintiff’s Amended Complaint.

Setting aside the form of Plaintiff Dana W. Wiley’s (“Wiley”) opposition to Defendants’ Motion to Dismiss, Wiley presents no legal arguments in response to the substance of Defendants’ Motion. In addition, although largely unintelligible, the opposition serves to confirm not only the implausibility of Wiley’s claims, but also his unfortunate mental health issues and delusional assertions.

For example, Wiley asserts for the first time in his opposition that WWE Superstars Kevin Nash, Paul Michael Levesque, Shaun Michaels, Scott Hall, Hulk Hogan and Eric Bischoff all supposedly appeared at his August 21, 1995 sentencing hearing in Lawrence County, at which Wiley supposedly gave them several NWO/DX t-shirts, and at which the WWE Superstars supposedly had Wiley sign the contract at issue. Dkt. 19 at 1. It is utterly implausible that six WWE Superstars would have spontaneously attended Wiley’s August 21, 1995 sentencing hearing and that Wiley, who had been incarcerated since May 1995, would have given them several NWO/DX t-shirts that he somehow had with him in prison — let alone that those WWE Superstars would have had Wiley sign a contract (at the precise time he was being sentenced to prison for aggravated assault) that entitled him to \$75 million.

Moreover, the remainder of Wiley’s opposition is directed to purported events that have no connection to his claims against Defendants. In Wiley’s “History of the Case,” Wiley claims that celebrities Suge Knight, Princess Diana, and the “Clinton u.s. president administration” also appeared at his August 21, 1995 sentencing hearing in Lawrence County to have him sign an unidentified, separate document than the document Wiley claims the WWE Superstars had him

sign. Dkt. 19 at 1. He further asserts that Don King and Janet Jackson later visited him in jail and that several female hip-hop artists are in “possession of a check for sum \$75-million” that Wiley appears to claim the “clinton administration” mailed to him. *Id.* Wiley then asks the Court to interview the “Trump and Bush Administration” about the “History of the Case” and schedule a private hearing with those administrations for settlement purposes. *Id.* at 2. Finally, in his “Statement of the Arument” [sic], Wiley refers to a supposed February 29, 2000 report from a “Special F.B.I./C.I.A. Agent” and an “affidavit statement” and “audio recording” from the “Bush Administration” that, at least based on Wiley’s description, relate to “confidential drug information” and not this case. *Id.*

Accordingly, for the foregoing reasons and those set forth in Defendants’ opening Brief, Defendants respectfully request that the Court grant Defendants’ Motion and dismiss Wiley’s Amended Complaint with prejudice.

Dated: June 6, 2019

Respectfully submitted,

**K&L GATES LLP**

/s/ Christopher M. Verdini

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2019 the foregoing was filed electronically. In addition, I hereby certify that a copy of the foregoing was sent by first-class mail to Plaintiff at the following address of record:

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